

**REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated April 29, 2008 has been received and its contents carefully reviewed.

No claims are amended. Claim 2 was previously canceled without prejudice or disclaimer. No claims are added. Accordingly, claims 1 and 3-4 are currently pending. Reexamination and reconsideration of the pending claims is respectfully requested.

**Claims 1, 3 and 4 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,058,355 to Ahmed et al. (hereinafter “*Ahmed*”) in view of European Application Patent No. 120,640 to *Fairbairn* (hereinafter “*Fairbairn*”) in view of U.S. Patent Application Publication No. 2002/0011923 to Cunningham et al. (hereinafter “*Cunningham*”).** *Office Action* at p.2. Applicants respectfully traverse the rejection and request reconsideration.

As required in Chapter 2143.03 of the MPEP, in order to “establish *prima facie* obviousness of the claimed invention, all the limitations must be taught or suggested by the prior art.” Applicants submit that neither *Ahmed*, *Fairbairn* nor *Cunningham* either singularly or in combination, teach or suggest each and every element recited in claims 1, 3 and 4.

Independent claim 1 is allowable over the cited references in that claim 1 recites a method for identifying multiple home networks comprising, at least, “accessing a house code managing site on the Internet by the network controller, receiving, at the network controller, a house code assigned from the house code managing site, transferring the house code to a relevant adapter.”

*Ahmed* discloses a CEBus network that comprises a plurality of utility-managed settable nodes (UMSNs) 125. *See Ahmed* at col. 3, lines 49-52. *Ahmed* also discloses network terminals (NTs) connected to the CEBus network where “from the perspective of the CEBus network 130, the NT 135 is another UMSN 125.” *Ahmed* at col. 4, lines 6-7. *Ahmed* teaches a utility host master node (UHMN) that is “a central management entity, responsible for

monitoring and controlling UMSN's 125 located in several residences 120." *Ahmed* at col. 5, lines 46-48.

The Office construes the NT of *Ahmed* as the claimed network controller, and the UHMN of *Ahmed* as the claimed house code managing site. See *Office Action* at p. 3, ¶ 1, lines 6-8 and lines 11-12. *Ahmed* teaches, however, that "a configuration master is a master node, including a UHMN, that is in control of house code propagation to one or more CEBus devices, including UMSNs and NTs." *Ahmed* at col. 8, lines 19-22. The NT of *Ahmed* cannot be construed as the claimed network controller because: it is not a configuration master, it is not a master node, it is not a UHMN. The house code propagation in *Ahmed* is controlled by the UHMN, not the NT. Thus, the NT disclosed by *Ahmed* does not access "a house code managing site on the Internet." Nor does it receive "a house code assigned from the house code managing site [and transfer] the house code to a relevant adapter," as recited in claim 1.

*Ahmed* teaches that the "UHMN 720 acquires an unique house code for each of its active BAN ports 725" and that "the same house code assigned to a BAN port 725 is then assigned to all UMSNs 755, including all NTs 750, located on a CEBus network 773 connected to that BAN port 725 via the respective BAN 740." *Ahmed* at col. 8, lines 27-28 and lines 31-33 and FIG. 7. Thus, the UHMN acquires a house code not the NT as purported by the Office.

Even further, *Ahmed* teaches that "the UHMN 720 broadcasts the proposed house code address in a 'hailing LPDU' to all the CEBus networks 773" and "each NT 750 of each CEBus network 773 that receives the hailing LPDU forwards it to the respective CEBus nodes." *Ahmed* at col. 8, lines 54-59. Thus, the NT (network controller as purported by the Office) does not access the UHMN (house code managing site as purported by the Office). In contrast, the UHMN accesses the NT to broadcast a proposed house address.

*Fairbairn* fails to cure the deficiencies of *Ahmed*. *Fairbairn* teaches a control system of an electrical main supply that services separate houses. See *Fairbairn* at p. 4, lines 16-18. *Fairbairn* discloses that controllers within the houses "can each only generate the house address code for that house, 2, 3, or 4 respectively." *Fairbairn* at p.5, lines 13-15. Thus, the controllers of *Fairbairn* do not access "a house code managing site on the Internet," receive "a house code assigned from the house code managing site," and transfer "the house code to a relevant

adapter,” as recited in claim 1. Accordingly, *Fairbairn* does not teach or suggest all of the features of claim 1.

*Cunningham* fails to cure the deficiencies of *Ahmed* and *Fairbairn*. *Cunningham* teaches that “when a controller ... is plugged into the power lines 27 of a house 10, it will first perform a search ... for other controllers ... if the controller ... determines ... that there are no other controllers plugged into the power lines 27 for the house, it will select a house code (step 304) for the house” and when the controller detects a new device “it will provide the new device with the house code.” *Cunningham* at ¶ [0040]. In other words, the controller selects the house code and does not, access “a house code managing site on the Internet,” receive “a house code assigned from the house code managing site,” and transfer “the house code to a relevant adapter,” as recited in claim 1. Therefore, *Cunningham* does not teach or suggest all of the features of claim 1.

Accordingly, for the above stated reasons, Applicants respectfully request that the Office withdraw the 35 U.S.C. § 103(a) rejection of independent claim 1. Claims 3 and 4 depend from independent claim 1. It stands to reason that the 35 U.S.C. § 103(a) rejection of those dependent claims should be withdrawn as well.

### Conclusion

The application is in condition for allowance. Early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the

filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: July 8, 2008

Respectfully submitted,

By Michael J. Long (Reg. No. 46,522)  
for Mark R. Kresloff  
Registration No.: 42,766  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(202) 496-7500  
Attorneys for Applicant